

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
THE NORTHERN DIVISION **RECEIVED**

CAROLYN MILLENDER )

Plaintiff, )

VS. )

H. COUNCILL TRENHOLM )

STATE TECHNICAL COLLEGE; )

ANTHONY MOLINA, in his )

official capacity as President of )

H. Councill Trenholm State College )

Defendants. )

2007 JUN 29 P 2:38

DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

CASE NO.: 2:07-cv-145-MHT

**AMENDED ANSWER OF DEFENDANTS**

COME NOW the Defendants in the above-styled cause, by and through undersigned counsel, and respond to the Plaintiff's Amended Complaint by reasserting and incorporating by reference, as if fully set out herein, the responses and defenses set forth in Defendants' Answer filed on February 16, 2007, and further respond to the Amended Complaint as follows:

1. Defendants deny the additional allegations asserted in paragraph 32 of the Amended Complaint that Defendant Trenholm retaliated against the Plaintiff by purportedly unjustifiably criticizing her performance, by subjecting her to an unjustified evaluation, and demand strict proof thereof.

2. Defendants do not have sufficient information to admit or deny the additional allegation as asserted in paragraph 34 relating to Plaintiff's receiving the statutory Right to Sue letters and demand strict proof thereof.

3. Defendants are without sufficient information to admit or deny the additional allegations as set forth in footnote 2 of the Amended Complaint and demand strict proof thereof.

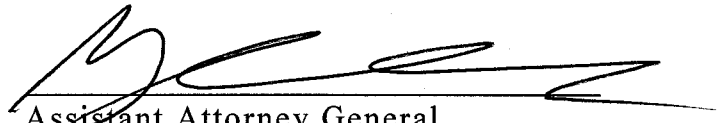
4. Defendants do not have sufficient information to admit or deny the additional allegations asserted in paragraph 35 regarding whether the Plaintiff amended her complaint within 90 days of receiving the Right to Sue letter from the Civil Rights Division of the U.S. Department of Justice and demand strict proof thereof.

5. Defendants deny the additional allegations asserted in paragraph 37 of the Amended Complaint that Defendant Trenholm has retaliated against the Plaintiff by purportedly unjustifiably criticizing her performance, by subjecting her to an unjustified evaluation, and demand strict proof thereof.

6. Defendants deny the additional allegations asserted in paragraph 41 of the Amended Complaint that the Defendants subjected the Plaintiff to retaliatory practices that purportedly included unjustifiably criticizing her performance, subjecting her to an unjustified evaluation, and demand strict proof thereof.

Defendants reserve the right to amend their Amended Answer.

Respectfully submitted on this 29th day of June, 2007.



Assistant Attorney General  
Counsel for the Defendants

OF COUNSEL:

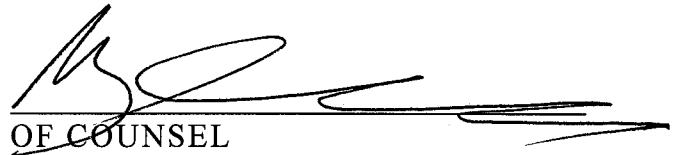
OFFICE OF THE ATTORNEY GENERAL  
11 South Union Street  
Montgomery, AL 36130  
(334) 353-9189  
(334) 242-2433 (fax)

CERTIFICATE OF SERVICE

I hereby certify that I have, this 29<sup>th</sup> day of June, 2007, served a copy of the foregoing upon the following counsel, by placing the same in the United States mail, postage prepaid, and properly addressed as follows:

William F. Patty, Esq.  
Beers, Anderson, Jackson, Patty, Van Heest  
& Fawal, PC  
P.O. Box 1988  
Montgomery, Al 36102

Candis A. McGowan, Esq.  
Wiggins, Childs, Quinn & Pantazis, LLC  
The Kress Building  
301 19<sup>th</sup> Street North  
Birmingham, AL 35203

  
OF COUNSEL